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July 25, 2025

## VIA ECF

Hon. Ronnie Abrams, U.S.D.J. Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Rugova v. Silverstone Property Group LLC et al. 23-cv-02648-RA-RWL

Dear Judge Abrams:

This firm represents Defendants Silverstone Property Group, LLC ("Silverstone") and Madison Realty Capital, L.P. ("Madison") (collectively, "Defendants"). Pursuant to Paragraph 1(D) of Your Honor's *Individual Rules & Practices in Civil Cases*, Defendants write to respectfully request an extension of the current summary judgment briefing schedule due to new settlement discussions that have just transpired.

As indicated in the Defendants' prior letters, the Parties' briefing schedule has been extended multiple times for various reasons. In order to give the parties sufficient time to maximize the prospects of this very recent round of unexpected settlement discussions that can obviate the need for motion practice, the Parties have agreed to jointly request a one-week extension of the deadline to file summary judgment motions. The opposition and reply deadlines will not be affected by this request. As such, if this extension is granted, the overall time to complete briefing will not be affected.

The Parties jointly request that the Court adjust the briefing schedule as follows:

• Moving papers: From July 28, 2025, to August 1, 2025

• Opposition papers: Remains September 5, 2025

• Reply papers: Remains September 26, 2025

This is a joint request to extend this deadline. Interim briefing schedule deadlines will not be affected should the Court grant this extension request.

Application granted.

SO ORDERED.

Hon. Ronnie Abrams

July 28, 2025

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Thank you for Your Honor's time and consideration.

Respectfully Submitted, CLIFTON BUDD & DeMARIA, LLP Attorneys for Defendants

Bv:

Ian-Paul A. Poulos